



PUBLIC HIGHWAY AUTHORITY

Adams County, Arapahoe County, Douglas County, Cities of Aurora, Brighton, Commerce City, Thornton and the Town of Parker, Colorado

Dan Baker
Director of Information Technology
E-470 Public Highway Authority
22470 E. 6th Parkway
Aurora, CO 80013

March 14, 2003

To: Federal Communications Commission

Subject: Comments of Dan L. Baker, Director of Information Technology for the E-470 Public Highway Authority in Aurora, Colorado and submitted in the following FCC proceeding:

In the Matter of Amendment of the Commission's Rules Regarding Dedicated Short-Range Communications in the 5.850-5.925 GHz Band (5.9 GHz Band), WT Docket No. 01-90.

E-470 is a toll highway that runs along the eastern perimeter of the Denver metropolitan area. The 47-mile beltway extends from State Highway C-470 at I-25 in Douglas County south of Denver, runs east and then north through Aurora, passes along the western edge of the Denver International Airport, and turns back towards the west, terminating at I-25 on the north end of the metropolitan area just south of 160th Avenue.

Electronic toll collection and the dedicated radio frequencies required to make it work are critical to the operation of our road. Of the almost \$39M of toll revenue that we collected in 2002, 60% was collected using the current 915 MHz frequency allocation.

As our industry evolves, the need for interoperability between agencies is critical. In Colorado we are currently developing business rules and technical specifications to provide for interoperability between the two private toll road operators and the newly formed state tolling authority. As these efforts continue on the state, regional and nationwide levels, the need for a new, higher capacity standard is obvious. Once the standard is in place an interoperable system can be developed for all manner of tolling, vehicle-to-roadside, and vehicle-to-vehicle communications.

We believe that a higher bandwidth standard, that allows multiple types of interaction with the driver, will encourage the development of standard on-board-units (OBU's) that provide for multiple types of vehicle communication. In the long-term, standardization can reduce the cost of tolling and provide more seamless interoperability for our customers.

Therefore, E-470 Public Highway Authority strongly supports the designation of a portion of the frequencies in the 5.9 GHz band for Intelligent Transportation Services (ITS). Thank you for your consideration.

A handwritten signature in cursive script that reads "Dan L. Baker".

Dan L. Baker
Director of Information Technology
E-470 Public Highway Authority

22470 E. 6th Parkway, Suite 100, Aurora, Colorado 80018 (303) 537-3470 FAX (303) 537-3472